



Decision \_\_\_\_\_

**FILED**  
8-29-16  
11:35 AM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Triennial Cost Allocation Proceeding Phase 1 Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U902G) for Authority to Revise their Natural Gas Rates Effective January 1, 2016.	Application 14-12-017 (Filed December 18, 2014)
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**INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK AND  
DECISION ON INTERVENOR COMPENSATION CLAIM  
OF THE UTILITY REFORM NETWORK**

<b>Intervenor: The Utility Reform Network</b>	<b>For contribution to Decision (D.) 16-06-039</b>
<b>Claimed: \$ 35,101.20</b>	<b>Awarded: \$</b>
<b>Assigned Commissioner: Michel Picker</b>	<b>Assigned ALJ: Gerald F. Kelly</b>
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	<b>/s/</b>
<b>Date: 8/29/16</b>	<b>Printed Name: Robert Finkelstein</b>

**PART I: PROCEDURAL ISSUES (to be completed by Intervenor except where indicated)**

<b>A. Brief description of Decision:</b>	<p>The Triennial Cost Allocation Proceeding (TCAP) is the application typically serves as the vehicle for review and modification of inter-class cost allocation, as well as allocation of storage and balancing assets, and resolution of certain other storage and balancing issues. The current TCAP is being conducted in two phases; this Phase 1 application covered storage costs and allocations, and certain balancing-related issues. A separate Phase 2 application (A.15-07-014) addresses other TCAP issues such as updated demand forecasts, marginal costs, revenue allocation and rate design.</p> <p>In D.16-06-039, the Commission addressed a range of uncontested and contested issues. Many of the contested issues were addressed in a proposed settlement that the Commission adopted in the decision. TURN was one of the sponsors of the</p>
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	proposed settlement, and each of TURN's substantive issues (load balancing, allocation of storage costs, and unbundled storage program revenue sharing) was covered by the proposed settlement.
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

	Intervenor	CPUC Verified
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference (PHC):	3/10/15	
2. Other specified date for NOI:		
3. Date NOI filed:	4/1/15	
4. Was the NOI timely filed?		
<b>Showing of customer or customer-related status (§ 1802(b)):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.14-05-001 CMRS ROW Rulemaking	
6. Date of ALJ ruling:	9/5/14	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
<b>Showing of "significant financial hardship" (§ 1802(g)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.14-05-001 CMRS ROW Rulemaking	
10. Date of ALJ ruling:	9/5/14	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.16-06-039	
14. Date of issuance of Final Order or Decision:	6/28/16	
15. File date of compensation request:	8/29/16	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I (use line reference # as appropriate):**

#	Intervenor's Comment(s)	CPUC Discussion
	On 10/15/15, TURN's Board of Directors adopted amendments to TURN's bylaws and articles of incorporation. The amended version of TURN's by-laws and articles of incorporation were submitted on January 6, 2016 in A.15-09-001 (PG&E 2017 GRC). The by-laws and articles of incorporation have not changed since their submission in that proceeding.	

**PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Intervenor except where indicated)**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<p><b>1. Proposed Revision of Monthly Imbalance Tolerance:</b> The Sempra Utilities proposed to move from 10% to 5% monthly balancing. TURN supported that change in testimony. The Settling Parties agreed to an 8 percent monthly imbalance tolerance, which is roughly the midpoint between the proposed 5% and the current 10% intolerance level. The Commission found the change from 10% to 8% to be a reasonable compromise and something that will help to enhance system reliability.</p>	<p>Ex. TURN-01 (Emmrich Direct Testimony), p. 1.</p> <p>Settlement Agreement at A-8 to A-9; Joint Settlement Motion at 12.</p> <p>D.16-06-039, p. 28 and Finding of Fact 32.</p>	
<p><b>2. Allocation of Storage Costs Among Core, Balancing and Storage Services:</b> The Sempra Utilities proposed a revised allocation of storage costs among balancing, core, and storage functions to achieve consistency with the approach taken in PG&amp;E's Gas Accord. TURN's testimony called for rejection of this proposal, as it would allocate far greater costs to the core and balancing functions, with a corresponding reduction to the costs allocated to unbundled storage. TURN also pointed out the lack of study or other showing that might demonstrate the reasonableness of the utilities' revised allocation.</p> <p>The proposed settlement adopted an alternative cost allocation methodology that began with the status quo, with modifications to further allocate the costs over seasonal injection and withdrawal capabilities.</p>	<p>Ex. TURN-01 (Emmrich Direct Testimony), pp. 1-2 and Table 3.</p> <p>Settlement Agreement at A-6 to A-7; Joint Settlement Motion at 9-10.</p> <p>D.16-06-039, p. 39-41, Findings of Fact 42-44.</p>	

<p>The Sempra Utilities also committed to perform a storage functionalization cost causation study by function, with the results presented as part of its direct showing in the next TCAP. The Commission found this to be a reasonable compromise for allocation storage costs, citing with favor the commitment to a cost causation study for the next TCAP.</p>		
<p><b>3. Unbundled Storage Program Revenue Sharing Mechanism:</b> SoCalGas operates its unbundled storage program subject to a net revenue sharing mechanism that allocates the net revenues between shareholders and ratepayers. The utility sought to modify the sharing ratio so a greater share would go to shareholders. TURN opposed this proposal, and recommended that either the status quo be retained or the sharing mechanism be abandoned altogether. TURN also presented an alternative mechanism that was largely modeled on the status quo, but with modifications to address SoCalGas's claims of the need to incur higher marketing and related costs.</p> <p>The proposed settlement resolved this issue by adopting an alternative sharing mechanism proposed by ORA. The Commission found the terms of the unbundled storage mechanism in the settlement to be reasonable.</p>	<p>Ex. TURN-01 (Emmrich Direct Testimony), pp. 3-4.</p> <p>Settlement Agreement at A-7 to A-8; Joint Settlement Motion at 10-11.</p> <p>D.16-06-039, p. 46-47, Findings of Fact 45-46.</p>	
<p><b>4. Need for Supplemental Testimony on "Status Quo:</b> TURN's Protest addressed the need for a baseline showing on the "status quo," pointing out that the Sempra Utilities' showing only set forth the results from their proposed changes in methodology, making it unnecessarily difficult for the parties and the Commission to meaningfully compare the impacts under those proposals to the status quo. At the Prehearing Conference, after TURN further explained the basis for its request, ORA, SCGC, and Indicated Shippers each expressed their support for the request. The assigned ALJ directed the Sempra Utilities to provide such supplemental testimony based on the methods prescribed in the Commission's prior BCAP and TCAP decisions.</p>	<p>TURN Protest, pp. 5-6.</p> <p>E-Mail Ruling Memorializing Request Made By Assigned Administrative Law Judge in Prehearing Conference on March 10, 2015.</p>	

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?</b>	<b>Yes</b>	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	<b>Yes, on some issues</b>	
<b>c. If so, provide name of other parties:</b> TURN's position on monthly imbalances was shared with the Sempra Utilities; TURN's position on allocation of storage costs among services was shared with Southern California Generation Coalition (SCGC) and the City of Long Beach; and TURN's position on the revenue sharing mechanism was similar to the positions of ORA and SCGC.		
<b>d. Intervenor's claim of non-duplication:</b>  As the description above makes clear, the alignment of parties' interests on the issues assigned to this Phase 1 proceeding shifted on an issue-by-issue basis. TURN coordinated with ORA on the issues addressed by both parties, but this did not include the monthly imbalance issue (which ORA did not address). TURN also took advantage of ORA's coverage of a broader array of issues, generally following the staff's lead during the settlement negotiations regarding the issues TURN had not addressed in testimony  The Commission should find that TURN's participation was efficiently coordinated with the participation of ORA wherever possible, so as to avoid undue duplication and to ensure that any such duplication served to supplement, complement, or contribute to the showing of the other intervenor. And consistent with such a finding, the Commission should determine that all of TURN's work is compensable consistent with the conditions set forth in Section 1802.5.		

**C. Additional Comments on Part II (use line reference # or letter as appropriate):**

<b>#</b>	<b>Intervenor's Comment</b>	<b>CPUC Discussion</b>

**PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)**

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

<b>a. Intervenor's claim of cost reasonableness:</b>	<b>CPUC Discussion</b>
<p>TURN's request for intervenor compensation seeks an award of approximately \$35,000 as the reasonable cost of our participation in the proceeding. In light of the scope and quality of TURN's work, and the benefits achieved through TURN's participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.</p> <p>The utilities application had proposed allocation of authorized storage costs in a manner that would have increased by approximately \$1.7 million the amount allocated to core customers in 2016, and \$2.1 million in each year from 2017-2019 as compared to retaining the status quo allocation, with substantial reductions in the amounts allocated to unbundled storage. (Table 1 of Emmrich Testimony) The allocation in the settlement agreement adopted in D.16-06-039 resulted in figures \$4-\$5 million lower allocated to the core, and higher figures allocated to unbundled storage. D.16-06-039, p. 39 (Table 7). Similarly, the difference between the unbundled storage program sharing mechanism as proposed by the Sempra Utilities and as resolved in the settlement ensured a greater portion of the program's revenues flow to ratepayers.</p> <p>In sum, the Commission should conclude that TURN's overall request is reasonable in light of the benefits to Sempra Utility ratepayers that were attributable in part to TURN's participation in the case.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>TURN's attorneys recorded a very reasonable number of hours for their work in this matter. Robert Finkelstein was primarily responsible for this proceeding, with some timely but relatively limited assistance from Marcel Hawiger. Mr. Finkelstein recorded approximately 13 hours for work associated with the initial review of the application, preparation of TURN's protest, and participation in the prehearing conference, with Mr. Hawiger recording 1.75 hours associated with discovery preparation during that period. Mr. Hawiger played a more prominent role in the development and review of TURN's direct testimony, recording 7.25 hours during June of 2015, a period during which Mr. Finkelstein was focused on the Sempra Utilities' GRC hearings. From that point forward, Mr. Finkelstein handled preparation for and participation in the evidentiary hearings, the drafting of TURN's opening brief, negotiation of the proposed settlement, and all other aspects of the case leading up to issuance of the proposed decision. The 35 hours recorded for his effort during that period is quite reasonable under the circumstances. The remaining hours of Mr. Finkelstein's time included here were associated with ongoing follow-up tasks associated with a tax issue that arose regarding the proposed settlement, and review of the Proposed Decision when it issued.</p> <p>Herb Emmrich served as TURN's consultant and expert witness in the</p>	

proceeding. The hours included for his work were recorded in a relatively compressed period, with approximately 20 hours associated with analysis of the utilities' showing and preparation of his direct testimony (6/1/15 through 6/14/15), and approximately 15 hours for review of the utilities' and other intervenors' testimony in order to assist TURN's attorney in preparation for the evidentiary hearings, preparing to appear for cross-examination at those hearings, and consulting for purposes of preparing TURN's opening brief and settlement efforts.

**Compensation Request Preparation Time:** TURN is requesting compensation for 6.5 hours devoted to compensation-related matters, of which 6.0 hours is for preparation of this request for compensation. Mr. Finkelstein prepared this request for compensation because his role as primary attorney for TURN in the proceeding enabled him to prepare the request in a more efficient manner than if it were prepared by one of the other attorneys less familiar with the proceeding and TURN's work therein.

TURN submits that the recorded hours are reasonable. Therefore, TURN seeks compensation for all of the hours recorded by our attorneys and expert witness that are included in this request.

**c. Allocation of hours by issue:**

TURN has allocated all of our attorney and consultant time by issue area or activity, as evident on our attached timesheets. The following codes relate to general activities that are part of nearly all CPUC proceedings, such as tasks associated with general participation, procedural matters, and coordination with other parties, as well as the specific substantive issue and activity areas addressed by TURN in this proceeding.

Code	Stands for:
GP	General Participation -- work that is essential to TURN's participation but would not vary with the number of issues that TURN addresses, for the most part. This code appears most regularly during early stages of broad reviews, such as the initial review of the application and testimony, and other similar tasks that are of a more general nature.
GH	General Hearing -- Hearing-related (preparation and participation), but not issue-specific.
Sett	Settlement -- efforts related to discussing, developing and then defending the settlement adopted in the proceeding..
PD	Proposed Decision -- work on reviewing, analyzing, commenting on, and strategizing on the Proposed Decision and revisions thereto.
Coord	Coordination with other parties -- meetings, e-mails and phone calls, primarily w/ ORA here, about issue coverage, etc.
Bal	Monthly imbalance tolerance issue.

RS	Net revenue sharing for unbundled storage program issue.	
S	Storage cost allocation to storage function issue	
Comp	Time devoted to compensation-related pleadings	
#	Time entries that cover substantive issue work that cannot easily be identified with a specific activity code. In this proceeding the time entries coded # represent a relatively larger-than-usual portion of the total hours. TURN's focus on a relatively limited subset of the issues in this proceeding and the nature of TURN's work on those issues resulted in a number of instances in which it was easy to allocate the work to substantive issues generally, but not to a specific substantive issue. As a reasonable allocation of the time coded # to substantive issues, TURN proposes that the Commission allocate these entries 5% to monthly balancing intolerance (B), 35% to unbundled storage net revenue sharing (RS), and 60% to storage cost allocation to storage function (S).	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Robert Finkelstein	2015	50.0	\$505	D.15-08-023 (for 2014 – 2015 COLA of 0%)	\$25,250.00			
R. Finkelstein	2016	5.0	\$510	2015 Rate, with 1.28% COLA per Res. ALJ-329	\$2,550.00			
Marcel Hawiger	2015	9.50	\$410	D.15-06-021 (for 2014; 2015 COLA of 0%)	\$3,895.00			
Herbert Emmrich	2015	34.0	\$50	Requested here	\$1,700.00			
Subtotal: \$ 33,395.00						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								

Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
R. Finkelstein	2015	0.5	\$252.50	½ of approved 2014 rate	\$126.25			
R. Finkelstein	2016	6	\$255.00	½ of requested 2016 rate	\$1,530.00			
Subtotal: \$1,656.25						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
	Photocopying	Copies made of TURN pleadings for service, and, where applicable, copying charges from consultant billings			\$42.10			
	Postage	Expenses for postage for this proceeding			\$7.85			
Subtotal: \$49.95						Subtotal: \$		
TOTAL REQUEST: \$ 35,101.20						TOTAL AWARD: \$		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								
ATTORNEY INFORMATION								
Attorney		Date Admitted to CA BAR <sup>1</sup>		Member Number		Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation		
Robert Finkelstein		June 1990		146391		No		
Marcel Hawiger		January 1998		194244		No		

**C. Attachments Documenting Specific Claim and Comments on Part III (Intervenor completes; attachments not attached to final Decision):**

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Attorney Time Sheet Detail
3	Expense Detail
4	Allocation by Issue Table
Comment 1	<b>2015 and 2016 Hourly Rates for TURN Representatives</b>  For 2015 hours, TURN has used the hourly rates already approved for work performed in 2014

<sup>1</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

	<p>by TURN's attorneys. This approach is generally consistent with the Commission's decision in Resolution ALJ-308 to not adopt a cost of living adjustment for 2015 for intervenor compensation purposes.</p> <p>For 2016 hours, TURN is requesting a rate increase consistent with the Commission's decision in Resolution ALJ-329 to adopt a cost of living adjustment of 1.28% for 2016 for intervenor compensation purposes. The rate requested represents the 2014-authorized rate increased by 1.28%, then rounded to the nearest \$5.</p> <p><u>2015 Hourly Rate for Herb Emmrich</u></p> <p>This is the first request for compensation in which TURN seeks recovery of costs of retaining Herbert Emmrich as a consultant and expert witness. Mr. Emmrich charged TURN a super-discounted rate of \$50 per hour for his work in this proceeding. Given his extensive training and experience, the Commission should find both that the requested rate is reasonable, and that it clearly represents a very substantial discount from the market rate that one with Mr. Emmrich's qualifications could command.</p> <p>Mr. Emmrich's statement of qualifications is included as Attachment 1 to his testimony in Exh. TURN-1. Mr. Emmrich has literally decades of direct experience, first with the Sempra Utilities (for SoCalGas from 1984 through his "first retirement" in 1998, then for SoCalGas and SDG&amp;E from 2002 through 2012) in Gas Demand Forecasting and Economic Analysis, then briefly with PG&amp;E as a manager of major gas proceedings in 2012-13. The Commission-adopted ranges for hourly rates for expert witnesses with 13 or more years of experience is \$170-\$420 for 2015. Res. ALJ-329. TURN would normally present further argument justifying the requested rate within the established range. Where, as here, the expert is charging TURN a discounted rate that is substantially below the established range, TURN submits that such additional argument should be unnecessary. However, if the Commission feels differently, TURN would be glad to supplement this request for compensation with additional material.</p>
Comment 2	<p><b>Expenses</b> – TURN has included the reasonable expenses for photocopying and postage associated exclusively with our participation in this proceeding.</p>

**D. CPUC Disallowances and Adjustments (CPUC completes):**

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

**Within 30 days after service of this Claim, Commission Staff  
or any other party may file a response to the Claim (see § 1804(c))**

**(CPUC completes the remainder of this form)**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

<b>Party</b>	<b>Reason for Opposition</b>	<b>CPUC Discussion</b>

<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	
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If not:

<b>Party</b>	<b>Comment</b>	<b>CPUC Discussion</b>

### **FINDINGS OF FACT**

1. Intervenor [has/has not] made a substantial contribution to D.\_\_\_\_\_.
2. The requested hourly rates for Intervenor's representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$\_\_\_\_\_.

### **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

### **ORDER**

1. Intervenor is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of Intervenor’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**Attachment 1**

**Certificate of Service**

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

## **Attachment 2**

Attorney Time Sheet Detail

Date	Atty	Case	Task	Description Hours	Time Spent
					Page 1
<u>Attorney: BF</u>					
1/14/15	BF	A14-12-017	GP	Review application and supporting testimony and wps on TCAP Ph 1; draft e-mail to NPedersen re: same	1.75
1/17/15	BF	A14-12-017	GP	Review app and supporting testimony for protest; begin outline of protest	1.75
1/20/15	BF	A14-12-017	GP	Begin draft of protest; further review of app and testimony; draft e-mail to MHawiger with questions	3.00
1/21/15	BF	A14-12-017	GP	Final draft and edit of protest	2.50
1/22/15	BF	A14-12-017	GP	Review MHawiger draft DR; e-mail question to MHawiger	0.50
1/25/15	BF	A14-12-017	S	Edit and draft DR on storage; e-mail to MHawiger re: same	0.50
1/27/15	BF	A14-12-017	S	Final review and edit of DR #1	0.25
3/9/15	BF	A14-12-017	S	Initial review of Sempra responses to DR 1; e-mail to MHawiger re: same	0.75
3/10/15	BF	A14-12-017	GP	Review protests, Sempra response, other materials to prep for PHC; attend PHC	2.00
3/31/15	BF	A14-12-017	Comp	Draft NOI	0.50
6/5/15	BF	A14-12-017	GP	E-mail exchange w/ MHawiger re: potential testimony topics, tactics	0.50
6/18/15	BF	A14-12-017	#	Discuss draft testimony w/ MHawiger; review draft Emmrich testimony, provide edits and comments	1.25
7/17/15	BF	A14-12-017	#	Initial review of rebuttal testimony of SEU, IS	0.50
7/20/15	BF	A14-12-017	GH	Further review of SEU and IS rebuttal testimony; draft e-mail to HEmmrich re: steps for review and dev't of cross	1.25
7/21/15	BF	A14-12-017	S	Review HEmmrich notes for potential cross on rebuttal testimony; draft e-mail to HEmmrich	0.75
7/27/15	BF	A14-12-017	GH	Develop cross estimates and provide to SEU	0.25
7/28/15	BF	A14-12-017	#	Begin preparation of cross-examination for hearings	2.00
7/29/15	BF	A14-12-017	Sett	P/c w/ Darryl Gruen re: potential settlement; review term sheet; e-mail to HEmmrich re: same	1.00
7/29/15	BF	A14-12-017	#	Continue prep of cross-examination materials for SEU witness;	1.50
7/30/15	BF	A14-12-017	Sett	Participate in p/c w/ SEU and ORA re: term sheet; draft proposed new language on issue re: cost allocation presentation in next TCAP; further e-mail exchanges w/ MThorp re: next steps, strategy ; draft e-mail to HEmmrich to update on settlement developments	2.25
7/31/15	BF	A14-12-017	GH	E-mail exchange w/ HEmmrich re: cross reserved for him by Shell, SCGC, potential cross issues	0.50
7/31/15	BF	A14-12-017	Sett	E-mail exchange w/ MThorp and DGruen re: sett conf, notice; review of sett conf notice draft	0.75
8/4/15	BF	A14-12-017	GH	Review Emmrich testimony, hrg tscpts in preparation for hearing; e-mails re: cross estimates for IS witness Alexander	2.00

Date	Atty	Case	Task	Description Hours	Time Spent
					Page 2
8/5/15	BF	A14-12-017	GH	Prep for and attend evid'y hearing -- HEmmrich for TURN, procedural discussion; discuss strategy w/ ORA after hearings	2.50
8/8/15	BF	A14-12-017	Sett	Review SEU draft of sett mtn; draft e-mail response to MThorp and DGruen	0.75
8/11/15	BF	A14-12-017	Sett	Review NC customer counter-offer; prep for and attend sett conf at SEU SF HQ; discuss potential strategy w/ SEU and ORA; discuss potential strategy w/ ORA	2.25
8/13/15	BF	A14-12-017	Sett	Review SEU draft of counter-proposal; p/c w/ SEU and ORA re: counter-proposal	0.75
8/17/15	BF	A14-12-017	Sett	Initial review of non-core parties' counter-offer; draft e-mail to counsel for ORA and SEU	0.25
8/18/15	BF	A14-12-017	Sett	Further review of non-core counter; p/c w/ SEU and ORA re: next steps	0.50
8/19/15	BF	A14-12-017	Sett	p/c w/ NPedersen re: balancing issue; conf call w/ all parties re: settlement negotiations; draft e-mails to HEmmrich re: settlement dev'ts, questions	1.50
8/20/15	BF	A14-12-017	Sett	Conf call w/ SEU and ORA re: next steps; draft e-mail to HEmmrich re: latest developments	1.00
8/21/15	BF	A14-12-017	Sett	Conf call w/ all parties to clarify current proposal, next steps; follow-up call w/ ORA re strategy	1.00
8/26/15	BF	A14-12-017	Sett	E-mail to SEU and ORA re: status of negotiations, next steps for presenting settlement and briefing or commenting on remaining disputed issues	0.75
8/27/15	BF	A14-12-017	Sett	E-mail to HEmmrich re: need for briefing according to existing schedule, steps to get brief drafted and reviewed; review and small edits to draft motion and settlement agreement;	0.75
9/1/15	BF	A14-12-017	Bal	Research old decisions on balancing; discuss w/ MHawiger; review case materials; draft opening brief	6.00
9/3/15	BF	A14-12-017	#	Finish drafting opening brief; final review and edit	2.25
9/8/15	BF	A14-12-017	#	E-mail to HEmmrich re: other parties' opening briefs	0.25
9/9/15	BF	A14-12-017	#	Review other parties' opening briefs	1.50
10/14/15	BF	A14-12-017	Sett	Review draft of reply cmmts on sttlement; draft cover e-mail re: needed chagnes	0.50
2/29/16	BF	A14-12-017	Sett	Draft e-mail to settling parties re: tax error in embedded cost calculation underlying settlement	1.50
3/1/16	BF	A14-12-017	Sett	Send E-mail to settling parties re: tax calculations, potential need for reviesion to settlement embedded cost calculation	0.25
3/10/16	BF	A14-12-017	Sett	P/c w/ settling parties re: tax amounts in storage embedded costs; f/u p/c w/ BMarcus	0.75

Date	Atty	Case	Task	Description Hours	Time Spent
					Page 3
3/18/16	BF	A14-12-017	Sett	Draft follow-up e-mail about deferred tax issue raised in Phase 2 testimony, potential impact on pending settlement, TURN decision to not pursue	0.50
5/17/16	BF	A14-12-017	PD	Initial review of PD on settlement, AC-related costs	0.50
6/1/16	BF	A14-12-017	PD	Review PD, other file materials	1.50
8/3/16	BF	A14-12-017	PD	Review case files, records for comp request preparation	1.00
8/19/16	BF	A14-12-017	PD	Draft comp request	4.00
8/25/16	BF	A14-12-017	PD	Final drafting of comp request	1.00
Total: BF					61.50

**Attorney: H Emmrich**

6/5/15	H Emmrich	A14-12-017	S	Reviewed SCG Witness Steve Watson's Testimony in SCG TCAP. Analyzed the effect of a change in cost allocation methodology proposed by SCG on core storage rates.	2.00
6/6/15	H Emmrich	A14-12-017	S	Worked on storage capacities proposed to be allocated to core customers by SCG, focus on amounts necessary to meet the core's peak day and cold year storage requirements.	2.00
6/7/15	H Emmrich	A14-12-017	RS	Worked on a revised net storage revenue sharing between shareholders and ratepayers.	6.00
6/8/15	H Emmrich	A14-12-017	S	Worked on TCAP testimony and continued to analyse storage cost allocation and capacity allocation proposals.	1.00
6/9/15	H Emmrich	A14-12-017	S	Worked on TCAP testimony and continued to analyse storage cost allocation and capacity allocation proposals.	1.00
6/10/15	H Emmrich	A14-12-017	RS	Worked on TCAP testimony and continued to analyse storage cost allocation and capacity allocation proposals.	0.50
6/11/15	H Emmrich	A14-12-017	RS	Worked on TCAP testimony and continued to analyse storage cost allocation and capacity allocation proposals.	1.00
6/14/15	H Emmrich	A14-12-017	S	Worked on a more limited TCAP testimony and continued to analyse storage cost allocation proposals. Finalized the testimony proposing a one third cost allocation of storage costs for each storage function, inventory, injection and withdrawal.	6.00
6/15/15	H Emmrich	A14-12-017	GP	Reviewed Direct testimonies of Semptra and intervenor testimonies: Watson, Fung, Long Beach, SCGC Yap, SCE Grimm, Shell, Alexander, and ORA.	5.00
7/17/15	H Emmrich	A14-12-017	#	Reviewed rebuttal testimonies of Semptra's Watson and Independet Producers' Dr. Alexander's testimony.	1.50
7/18/15	H Emmrich	A14-12-017	#	Prepared cross examination questions for Watson and Alexander.	3.00
7/30/15	H Emmrich	A14-12-017	Sett	Reviewed and commented on confidential settlement proposal and wrote up possible counter offers.	1.00

Date	Atty	Case	Task	Description	Hours	Time Spent
7/20/2016	12:45 PM					Page 4
7/31/15	H Emmrich	A14-12-017	Sett	Reviewed and commented on updated confidential settlement proposal and wrote up possible counter offers.		0.50
8/5/15	H Emmrich	A14-12-017	GH	Prepared to testify and testified at TCAP Phase 1 hearing.		1.50
8/8/15	H Emmrich	A14-12-017	#	Reviewed all intervenors' opening briefs, communicate w/ TURN atty re: no need for reply		2.00
Total: H Emmrich						34.00
<u>Attorney: MH</u>						
1/22/15	MH	A14-12-017	S	Write DR re Watson testimony		0.75
1/22/15	MH	A14-12-017	S	Read direct testimony of Watson re S costs and allocation		0.75
1/27/15	MH	A14-12-017	S	Review Bob's edits to DR and revise DR		0.25
6/4/15	MH	A14-12-017	S	Close read and analysis of responses to DR 01 re storage allocations		1.25
6/5/15	MH	A14-12-017	S	Review Watson S testimony; Send internal email memo to Herb E. re potential issues		1.00
6/9/15	MH	A14-12-017	#	TC mtg w/ Herb re issues for testimony		0.75
6/11/15	MH	A14-12-017	Coord	TC mtg w/ ORA to discuss positions on three issues		0.50
6/12/15	MH	A14-12-017	S	Internal emails w/ Herb re core storage inv issue		0.25
6/12/15	MH	A14-12-017	#	Read and edit Herb draft testimony		0.75
6/16/15	MH	A14-12-017	#	Edit Herb's revised testimony re cost allocation and profit sharing		0.75
6/17/15	MH	A14-12-017	#	Continue revisions to Herb's testimony		0.50
6/18/15	MH	A14-12-017	#	TC w/ Herb re draft testimony; edit revised draft of herb testimony		0.75
6/22/15	MH	A14-12-017	#	Final edits and close review of testimony and attachments; prepare final pleading		0.75
8/24/15	MH	A14-12-017	GH	TC w/ Bob re status of issues at hearings		0.25
9/2/15	MH	A14-12-017	Bal	Review draft opening brief re 5% balancing issue		0.25
Total: MH						9.50
Grand Total						105.00

### **Attachment 3**

#### Expense Detail

Date	case	Task	Description	Amount
Expenses.				Page 1
<b>Activity: \$Copies</b>				
1/21/15 rap	A14-12-017	\$Copies	Copy Of Protest Of TURN To Send To ALJ	\$0.90
6/22/15 HDG	A14-12-017	\$Copies	Copy Of Prepared Direct Testimony Of Herbert Emmerich To Mail To ALJ	\$7.60
9/4/15 HDG	A14-12-017	\$Copies	Copy of Opening Brief of TURN To send to ALJ - 16 pages at ten cents per page	\$1.60
9/8/15 **	A14-12-017	\$Copies	TURN Office Copies & Scans associated with A.14-12-017 for the period July 1, 2015 to September 9, 2015 (scans: 140)	\$14.00
1/5/16 **	A14-12-017	\$Copies	TURN Office Copies & Scans associated with A.14-12-0173 for the period September 10, 2015 to January 5, 2016 (scans: 180 )	\$18.00
Total: \$Copies				\$42.10
<b>Activity: \$Postage</b>				
1/21/15 rap	A14-12-017	\$Postage	Postage To Mail Protest Of TURN To ALJ	\$1.19
6/22/15 HDG	A14-12-017	\$Postage	Postage To Mail Prepared Direct Testimony Of Herbert Emmerich To ALJ	\$4.26
9/4/15 HDG	A14-12-017	\$Postage	Postage to mail Opening Brief of TURN To ALJ	\$2.40
Total: \$Postage				\$7.85
Grand Total				\$49.95

## **Attachment 4**

TURN Hours Allocated by Issue

## SUMMARY OF TURN STAFF AND CONSULTANTS

A.14-12-017

### ATTORNEYS AND CONSULTANTS

A.14-12-017												Total	Total			
ATTORNEYS AND CONSULTANTS												Substantive	Compensation			
			GP	GH	Sett	PD	Coord	Bal	RS	S	Comp	#	Hours (not including comp)	(non-travel, non-comp)		
Billing																
Period			Rate													
Robert Finkelstein	2015	\$505	12.00	6.50	14.00			6.00		2.25	0.50	9.25		50.00	\$25,250.00	
	2016	\$510			3.00	2.00					6.00			5.00	\$2,550.00	
Marcel Hawiger	2015	\$410		0.25			0.50	0.25		4.25		4.25		9.50	\$3,895.00	
Herbert Emmrich	2015	\$50	5.00	1.50	1.50				7.50	12.00		6.50		34.00	\$1,700.00	
																\$0.00
TOTAL			17.00	8.25	18.50	2.00	0.50	6.25	7.50	18.50		20.00		98.50	\$33,395.00	
TOTAL % HOURS ALLOCATED			17.26%	8.38%	18.78%	2.03%	0.51%	6.35%	7.61%	18.78%		20.30%		100.00%		